

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
SOUTHERN DIVISION**

LAYTHRON TILLIS, an individual)	
and ETHEL TILLIS, an individual,)	
)	
PLAINTIFFS,)	
)	
VS.)	1:07CV78-WKW
)	
CECIL E. CAMERON, an individual;)	
HERTZ CLAIMS MANAGEMENT, a)	
foreign corporation; THE HERTZ)	
CORPORATION, a foreign corporation,)	
)	
DEFENDANTS.)	

MOTION FOR EXTENSION OF DISCOVERY DEADLINE

COME NOW the Plaintiffs and move this Court to extend the deadline for discovery in this case, and in support of this Motion argues as follows:

1. The parties currently have a discovery deadline of July 28, 2008.
2. The Plaintiff, Laythron Tillis, is undergoing pain management therapy, and the Plaintiff is waiting on a decision from this doctor as to whether he may need back surgery, this decision having not been made at this point.
3. If the Plaintiff's doctor recommends surgery, then the Plaintiff's medical damages will greatly increase and until the decision is made, the Plaintiff cannot adequately assess his damages for trial. Moreover, the Plaintiff is uninsured for this surgery, should it be necessary, making the Plaintiff's ability to prove this element of his damages that much more important.
4. The Defendant opposes this extension.

WHEREFORE, for the above reasons, the Plaintiff moves this Court for a 30-day extension of the discovery deadline.

/s/Thomas B. Albritton
Thomas B. Albritton (ALB009)
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CERTIFICATE OF SERVICE

I hereby certify that I have this date served a copy of the foregoing upon all counsel of record in this cause by electronic service if registered, and if not, then by regular U.S. Mail, postage prepaid, to the following on this, the 28th day of July, 2008:

Mr. David W. Henderson
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/s/Thomas B. Albritton
Of Counsel